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ABSTRACT

Synthesized in this report are the findings of a study which focused on the effectiveness of the Emergency School Aid Act (ESAA) program at the Federal level in achieving two major outcomes: (1) targeting, or focusing, of ESAA grants and grant funds on school districts currently having the greatest desegregation related needs; and (2) funding activities that effectively fulfill the greatest desegregation related needs of school districts. Recommendations for changes in the ESAA program that are likely to enhance the effectiveness of the program in achieving its purposes are proposed. Specific needs addressed include those related to the planning and implementation of actions to eliminate discriminatory practices and reduce or prevent minority isolation and those related to actions that seek to promote equal status interactions and expectations within schools among minority and majority group members. Also reviewed are recommendations for changes in the Act already proposed by the Department of Health, Education and Welfare. Summaries of findings from other volumes dealing with this study are presented in the appendix. (Author/EB)

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ED170407

An Assessment of Emergency School Aid Act (ESAA) Program Operations

Volume III: Policy Recommendations

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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Stephen M. Smith
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An assessment of the operations of an ongoing program is not possible without the cooperation and support of program administrators. In this respect, our study has been fortunate. The staff of the U.S.O.E. Office of Equal Educational Opportunity Programs, which administers the ESAA program, has been particularly open and helpful. We would especially like to express our thanks to Dr. Herman Goldberg, Dr. George Rhodes, Mr. Jesse Jordan, Dr. Thomas Fagan and Ms. Marilyn Galvin. In addition, we are also indebted to the many EEOP staff that we interviewed for providing us with insights into the complex operations of the ESAA program.

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While many people have contributed to this study, responsibility for any errors rests with the author. The views reflected in this document are not necessarily the views of the U.S. Office of Education.

We must begin to build an educational system in which cultural diversity and pluralism are both accepted and supported...

We do not purport to have all the answers. We have no single solution to propose that we know will lead to equality in educational opportunity; nor do we believe there is a single policy or program that can alone ensure educational success. Many hopeful proposals that we might be implementing have not been tried. Others have been undertaken with so little effort that they have been inadequate to meet the goals for which they were designed. We think there must be a combination of policies and programs to make our schools succeed for those whom they now fail.

Senate Report of the Select Committee on Equal Educational Opportunity, 1972.

ASSESSMENT OF ESAA PROGRAM OPERATIONS

FOREWORD

The Emergency School Aid Act (ESAA)* was intended to aid school districts in the process of desegregating by providing financial assistance in the form of 1 year grants for local projects that would: meet "special needs incident to" desegregation; encourage the voluntary reduction of minority group isolation in schools with substantial proportions of minority pupils; and aid school children in overcoming the educational disadvantages of minority group isolation.

As the ESAA program entered its fifth year of operation in the fall, 1977, concern had been expressed that the ESAA program structure, activities and operations as established by the Act, Regulations and guidelines may not have been effectively delivering desegregation-related services to those school districts with the most current needs. DHEW was seeking changes in the Act as part of the Education Amendments of 1978.

The U.S. Office of Education contracted with Applied Urbanetics, Inc., of Washington, D.C., to conduct a study to assess whether the ESAA program had been meeting the desegregation-related needs of school districts. The intended audiences for the study were DHEW personnel responsible for recommending changes in the Act and Regulations, establishing program guidelines, and implementing and managing the program.

The findings and recommendations of this study are presented in this report and companion volumes. The study differed from previously funded evaluations which focused on the effectiveness of program activities and management at the school district level. The focus of this study was on the effectiveness of ESAA program operations at the Federal level in achieving two major outcomes:

- targeting, or focusing, of ESAA grants and grant funds on school districts currently having the greatest desegregation-related needs; and

* P.L. 92-318, Title VII.

- funding activities that effectively fulfill the greatest desegregation-related needs of school districts.

A major objective was to propose and analyze the impact of changes in the Act, Regulations and operations that might enhance the effectiveness of the program.

The detailed results of this study, An Assessment of Emergency School Aid Act (ESAA) Program Operations, have been presented in two previous volumes:

Volume I: The Targeting of ESAA Grants and Grant Funds - describes the results of analyses of the extent to which ESAA grants and grant funds have been focused on school districts with desegregation-related needs, and the extent to which the Act, Regulations and program processes influence the focusing of grants and funds.

Volume II: The Focus of ESAA Projects - presents findings concerning the influence of program operations on the focus of ESAA projects and activities, and findings concerning the relationship of projects to the desegregation-related needs of the grant recipients. Data were derived from case studies in 22 school districts across the nation. Summaries of each case study are presented in a separate appendix.

The summaries of findings from these volumes are presented in the appendix of this volume.

INTRODUCTION

The primary objective of this document is to propose recommendations for changes in the ESAA program that are likely to enhance the effectiveness of the program in achieving its purposes. Since the Federal government has little control over the actual daily conduct of local projects in a national grant program, such as ESAA, it can most influence the effectiveness of these programs by actively focusing grants and grant funds, and by clearly defining the focus of grant projects. In previous volumes, we have therefore examined: the extent to which ESAA grants and grant funds have been targeted to school districts with the greatest desegregation-related needs that have proposed projects of exceptional merit; the extent to which ESAA projects have been focused on fulfilling the greatest desegregation-related needs of grant recipients; and the influence of the Act, Regulations, and program administration on the targeting of grants and funds and on the foci of ESAA projects.

In this volume, we synthesize our findings and suggest changes in the Act, Regulations and ESAA administration that we judge likely to enhance ESAA program effectiveness in providing assistance to address the desegregation-related needs of school districts. These needs have been broadly interpreted to include:

1. Reassignment-oriented needs - needs related to the planning and implementation of the physical reassignment of students and staff, or other actions to eliminate discriminatory practices and reduce or prevent minority isolation; and

2. Integration-oriented needs - needs related to actions beyond reassignment that seek to promote equal status interactions and expectations within schools among minority and majority group members.

We also review, in light of our findings, the recommendations for changes in the Act already proposed by DHEW in conjunction with the Education Amendments of 1978.

SYNTHESIS OF FINDINGS

ESAA can be categorized as a program which seeks to eliminate and prevent inequalities in educational opportunity associated with membership in racial and language minority groups. The Act, in effect, defines three general approaches to achieving this goal: 1) to assist districts with needs arising from the elimination of minority group segregation and discrimination among students and faculty; 2) to assist districts in reducing or preventing minority group isolation; and 3) to assist districts in overcoming the educational disadvantages of their pupils in minority group isolated schools.

Only the first two approaches are necessarily reassignment- and integration-oriented. While the third approach may be associated with desegregation, it is more consistent with a view that Federal assistance should be devoted to helping school districts address the educational disadvantages of children regardless of the districts' abilities to reduce or eliminate minority isolation and to establish integrated environments.

Our study of the ESAA program has led us to the conclusion that:

> The ESAA program has been directed at eliminating and preventing inequalities in educational opportunities primarily by assisting districts in overcoming the educational disadvantages of children, rather than by assisting districts with their reassignment- and integration-oriented needs.

This is evidenced by the two major findings concerning the focusing of grants and funds, and the foci of ESAA projects. They are:

1. ESAA grants and grant funds have not been focused on districts on the basis of their desegregation-related needs. They have been more focused on districts on the basis of minority enrollment measures than measures related to plan implementation and plan impact, such as the reduction in minority isolation. Specifically:

- Most Basic and Pilot applicants receive grants (over 85 percent of FY 77 Basic applicants). Most eligible applicants receive the minimum qualifying scores. They have been able to achieve the minimum scores without any measurable plan impact.

  As a result, more than 35 percent of FY 77 Basic grant recipients in the north and west (14 percent nationwide) have achieved no net reduction in minority isolation. For FY 77 Pilot grant recipients, the comparable nationwide figure is 40 percent. However, 60 percent of the districts with high plan impact (as measured by reduction in minority isolation prior to 1974) have never received an ESAA grant of any type. Most have never applied.

- FY 77 Basic grant funds are, on the average, more related to minority enrollment than to measures of reduction in minority isolation and plan recency. Forty percent of FY 77 Basic grant funds in the north and west were awarded to districts with no reduction in minority isolation.

- ESAA grant recipients for the period FY 73-FY 77 are most distinguishable from nonrecipients on the basis of minority enrollment measures rather than plan-related measures.

- ESAA grants, with the exception of Special grants, have not been focused on more recently desegregating districts. Seventy percent of FY 77 Basic grant recipients implemented a plan prior to 1973. Sixty percent have received a grant every year of the program.

- Insufficient funds have been available for Basic grants to recently desegregating urban areas in the north and west as a result of the state apportionment formula which is based on minority enrollment.

2. ESAA projects tend to be primarily focused on providing direct services to disadvantaged students rather than on interracial or community activities involving groups of students, parents and teachers. The most common focus among 22 case study districts was remedial services. Specifically:

   - In most of the case study districts with FY 77 Basic grants, ESAA supported remedial services which complemented the Title I services provided by school districts.

   - In case study districts in which plan implementation was completed prior to 1968, ESAA was not perceived to be related to desegregation.

   - Private schools that were not involved in any way in a district's plan were receiving ESAA services focusing directly on individual student needs.

It is important to note that as a program primarily oriented towards the elimination of inequality of educational opportunity through direct services to disadvantaged students, the ESAA program appears to have addressed a major need of school districts. If more grant funds were available, grant recipients in the case study districts reported that they would expand their current project activities. In comparison with Title I (ESEA) compensatory education projects, ESAA was viewed by respondents as a more flexible answer to the many remediation needs of their districts because it less rigidly defined which schools and which students could be served. In a large proportion of districts, ESAA funds were comparable in amount to Title I funds. Nationally, the Title I appropriation is roughly 10 times the ESAA appropriation.

The two main features of the ESAA program which have distinguished it from Title I and every other Federal education program are the threshold eligibility criteria requiring the implementation of a desegregation plan or plan to reduce or prevent minority isolation, and the compliance eligibility criteria requiring the elimination of discriminatory practices affecting students and faculty. ESAA is thus the only equal educational

opportunity-oriented program which requires the elimination of discriminatory barriers to equal educational opportunity prior to receipt of funds.

These two features, however, are not sufficient to make ESAA a program focused on the desegregation-related needs of school districts. While grant recipients that viewed ESAA as desegregation-related have been able to focus projects on their post-implementation problems and their integration-oriented needs, recipients that did not, focused their projects on remedial services. ESAA program operations do not adequately encourage the former view as opposed to the latter. In this, the ESAA program reflects the conflicting perceptions of appropriate desegregation-related assistance that were present at the time of the Act's passage.

- Many provisions within the Act are sufficiently inconsistent and broad that they encourage the view that ESAA is an equal educational opportunity program which may or may not be related to desegregation or integration. Specifically:

  - The third purpose of the Act identifies children in minority isolated schools (schools over 50 percent minority) as disadvantaged and a target of ESAA assistance independently of their relationship to a district's plan.

  - In order for a school district to be eligible to receive an ESAA grant, the Act requires an applicant to have implemented its required or non-required plan. For illegally segregated districts, this mandate prevents the funding of ESAA projects while there are still illegal barriers to equal educational opportunities. However, by not specifying any requirement for the recency of plan implementation, the Act implies that implementation is not an important focus for ESAA projects except as an indication of the elimination of segregation as a barrier to equal educational opportunity. It also prevents ESAA from assisting districts in the period just prior to

plan implementation, the period regarded as highly critical to the success of plan implementation by district respondents.

- By specifying that applicant districts must have eliminated any discrimination in student and faculty assignments within schools and classrooms prior to receipt of a grant, the Act also ensures that discrimination is not a barrier to equal educational opportunity. However, it prevents ESAA funds from being used to assist districts in eliminating the vestiges of discriminatory practices.

- The Act mandates that private schools be given an opportunity to participate in ESAA projects to the extent that the private schools serve minority students in the geographical area independently of their involvement with the school district's plan. Although the private schools must not be engaging in discriminatory practices, they are not required to be implementing plans to reduce minority isolation.

- The Act authorizes two subprograms, Pilot and Bilingual, that are specifically directed at providing basic skills services to pupils considered educationally disadvantaged independently of their, or their school's, involvement in the district's eligible plan. Eligibility for Pilot grants is additionally based on measures relating to minority enrollment, not measures relating to plan impact.

- The Act (although not the Regulations) authorizes project activities focusing on direct services to individual students (i.e., remedial services, and guidance and counseling) without requiring that the activities be related to the implementation of the district's plan or to the establishment of integrated environments.

- The Act specifies that Basic, Pilot and NPO grant funds be apportioned to states on the basis of a formula employing only measures of the number of minority children in each state and not measures describing the desegregation activity in each state.

The Regulations have greatly and independently influenced the targeting of grants and funds through the criteria for the selection of grant recipients and the eligibility of districts and schools.

- The scoring system specified by the Regulations for competitively ranking applications for funding permits the selection of grant recipients primarily on the basis of the minority enrollment and minority percent of total enrollment rather than measures related to plan implementation and impact. Specifically:

  - While the total scores used to rank applications for funding are composed of a quality score and statistical score, quality scores have not significantly contributed to grant selection in many states since they have been narrowly peaked near the maximum quality score. This result is consistent with the view of the role of the quality score by EEOP officers. However, it is inconsistent with the administrative cost and time devoted to rating applications.

  - The lack of a minimum score criterion for plan impact and the near maximum quality scores permit applicants to receive grants without any plan impact.

  - While the stat score portion of the total score includes both measures of plan impact (i.e., reduction in minority isolation) and relative need, the within-state competition for grants has de-emphasized the influence of plan impact measures since most districts within a state and region have had similar plan impact scores.

- The only other measures employed in the statistical score are minority enrollment and minority percent of total enrollment. Other measures related to the recency and difficulty of plan implementation or financial need are not included. Additionally, the base year definition used in the calculation of plan impact does not emphasize recency of plan implementation.

- Quality score components related to needs assessment are also not given high weighting compared to other components. This has hindered the importance of measures of need that can not be incorporated into the stat score because the data are less uniformly available or the criteria are less objective.

- The focus of ESAA Basic projects is significantly influenced by the budget review process in which project components judged to be unrelated to a district's plan, and schools judged to be unaffected by the plan, are deleted. Since the Regulations and program guidelines do not present a consistent view of which schools are eligible for ESAA services, these judgments are susceptible to a high degree of variation. Specifically:

  - In the stat score, schools "affected by the plan" refers to schools included in the reassignment plan by name. According to program administration guidelines, however, some schools not involved in the reassignment may have needs related to the implementation of a plan and therefore may receive ESAA supported services.

  - The Regulations specify that district eligibility is not affected by the date on which its plan was implemented. However, the Regulations do not provide any guidance on how long after a plan is implemented, schools are still

"affected by the plan." All students attending the school at the time of implementation may have graduated and pupils slated to receive services may have been unborn at the time of implementation.

- While the Act and Regulations require that non-public school participation must assist in achieving the purposes of the Act, the Regulations permit compliance with this provision solely by the enrollment of a significant percentage of minority children in the geographical area.

To change long-established habits in the individual is a slow, difficult and complicated process.... To change long-established institutions is a much slower, more difficult, and far more complicated process. (John Dewey)

POLICY RECOMMENDATIONS

In February, 1978 DHEW Secretary Califano proposed changes in the Emergency School Aid Act that would "target assistance more directly on school districts currently undergoing desegregation or with pressing problems clearly related to previous desegregation activity." These changes have been incorporated in slightly varying forms into Senate and House bills constituting the Education Amendments of 1978.[1] Since these bills incorporate many of the changes in the Act that would follow from our findings, our recommendations primarily relate to changes in the program Regulations and administration. We attempt to analyze the impact of the changes in both the Act and Regulations. In order to relate the changes to our findings, they are discussed in terms of changes concerning the focus of projects, and changes in the targeting of grants and funds.

1 S. 1753 (Calendar No. 787) and H.R. 15 (Calendar No. 586).

Changes Concerning the Focus of ESAA Projects

The Act defines the focus of ESAA projects through the statements of program purposes, the establishment of grant categories, the authorization of specific project activities, and the eligibility of schools for assistance. The changes proposed in the Senate and House bills relating to the focus of ESAA projects are congruent with our findings indicating a need for consistency in purpose.

- The Senate bill emphasizes the desegregation orientation of the program by eliminating the third purpose of the Act -- to aid children in overcoming the educational disadvantages of minority isolation.

- Both Senate and House bills eliminate the grant categories least related to plan implementation and impact: the Pilot and Bilingual grant programs. Bilingual education, however, is still allowed under Special programs.

- Both Senate and House bills revise the list of authorized activities to de-emphasize direct services to students (see Table 1). The revised list does not explicitly include guidance and counseling services and only includes remedial services in order to continue Title I services lost as a result of plan implementation. The ordering of activities also places the training of school staff at the forefront. This was a major need identified by school district respondents in the 22 case studies. Also, as a result of changes in eligibility requirements, the bills authorize activities relating to the development and implementation of plans mandated by a court or agency.

- The Senate bill explicitly authorizes one-time 2-year grants to districts for the purposes of developing not only required plans, but also for developing nonrequired plans to reduce minority isolation.

TABLE 1

AUTHORIZED ACTIVITIES

(H.R. 15 Calendar No. 586 and S. 1753 Calendar No. 787)

1. The training of school staff, and local educational agency staff, in the handling of problems incident to the implementation of a qualifying plan;

2. the provision of additional staff members (including teacher aides) to assist in meeting educational needs that arise from the implementation of the plan;

3. the development or acquisition of new curricula, methods, practices, techniques or materials to support a program of instruction for children from all racial, ethnic, and economic backgrounds, including instruction in the language and cultural heritage of minority groups;

4. innovative educational activities, including extracurricular activities, which involve the joint participation of minority group children and other children;

5. community relations activities, including public information efforts, in support of the implementation of a qualifying plan;

6. planning, evaluation, dissemination and other administrative activities directly related and necessary to other activities in the program or project;

7. repair or minor remodeling or alteration of existing school facilities and the lease or purchase of mobile classroom units -- where necessary to carry out other activities in the program or project;

8. provision of compensatory services to children who have received such services under Title I, ESEA but who are no longer eligible to receive those services as a result of attendance area changes under a qualifying plan;

TABLE 1 (continued)

9. activities to prevent or eliminate recurring or continuing problems resulting from the implementation of a qualifying plan;

10. planning to implement or carry out a desegregation plan (H.R. 15 only); and

11. the conduct of educational activities in one or more minority group isolated schools which are not affected by the reassignment of children or faculty where the activities have been required by the court to remedy the effects of illegal segregation.

While these changes would strongly reorient ESAA to be desegregation-related, several features concerning the focus of projects still remain in these bills that will require further definition in the Regulations to maintain the desegregation emphasis.

Authorized Activities

In the proposed list of authorized activities, the wording employed is "...projects may include, but are not limited to...." This wording may still permit remedial or guidance and counseling services that are not related to a district's desegregation-related needs.

- On the basis of our research we recommend that provisions in the new Regulations ensure that if remedial or guidance and counseling services are proposed by an applicant that they are in fact related and necessary to the implementation of a district's plan or the establishment of integrated environments.

These provisions must be clearer than those in the current Regulations. This could be accomplished by provisions requiring the application narrative to contain explicit evidence that (1) district personnel and the parent advisory council have performed a global assessment of the problems and needs relating to their reassignment plan and to the integration of their schools, and (2) the proposed project addresses their greatest needs. This differs from the current requirement in which the application narrative must only provide evidence that the proposed project addresses a district need.

School Eligibility

Both bills do not address the questions surrounding school eligibility. In particular, the language related to private school eligibility is unchanged.

- We recommend that the provisions in the Regulations regarding private school eligibility be modified so that the mere fact that a school is privately supported rather than publicly supported does not make it eligible for ESAA assistance.

Additionally, the inconsistencies in the Regulations and guidelines concerning "schools affectd by the plan" need to be eliminated.

- We recommend that the Regulations state explicitly the types of evidence that would indicate that a school is affected by a plan. This could be accomplished in much the same manner as the bills list the authorized activities, i.e., "evidence that a school is affected by the plan may include, but is not limited to - ".

Eligible Schools and Court-Ordered Activities

Both bills authorize support for educational activities in minority isolated schools unaffected by a district's plan if the activities are ordered by a court to remedy the effects of illegal segregation. These provisions may, in effect, re-establish the Pilot grant program through school district requests to the courts to mandate compensatory services in schools.

Given these provisions in the Act, it is not clear how new Regulations may prevent this situation. By administrative emphasis on supporting projects focused on a district's highest priority needs relating to plan implementation, the extent to which compensatory services are funded in schools not affected by the plan may be limited in comparison to the funding of other desegregation-related projects in schools affected by the plan.

Demonstration Projects

Another recommendation concerning the foci of ESAA projects concerns the elimination of the Pilot grant program in the two bills. The original purpose of the program was to support unusually promising projects designed to overcome the adverse effects of minority group isolation. In our investigation of Pilot projects in the case study districts, there was no evidence that Pilot projects were ever replicated.

The concept of demonstration projects, however, is particularly relevant for the proposed shift towards a greater emphasis on supporting projects which address the desegregation-related needs of districts. As discussed earlier, the primary focus of ESAA projects have been on services which are familiar to district personnel, i.e., remedial services, guidance and counseling and inservice training. It is not clear that there is a significant body of knowledge on successful projects that address other desegregation and integration needs of school districts.

- We recommend that part of the Special projects appropriation be used to fund unusually promising projects addressing the desegregation-related needs of school districts and that there be specific dissemination strategies required. In light of existing research findings concerning the importance of the leadership of principals in achieving effective desegregation, projects directed at training and technical assistance for principals should be among the first of these funded projects.

Changes Concerning the Targeting of Grants and Funds

The Act specifies the eligibility criteria for applicants and the criteria for selection of grant recipients. In order to more highly focus grants and funds on districts with greater desegregation-related needs, these criteria must be more related to plan implementation and impact. Both the Senate and House bills propose changes in the Act which are consistent with this goal.

- The Senate bill explicitly expands threshold eligibility to districts not only planning magnet schools or neutral site schools, but to districts developing any type of required or nonrequired plan.

This would enable considerably more districts to obtain threshold eligibility and to address their needs relating to the development and implementation of a plan in the period just prior to implementation. School

district respondents had consistently identified this period as the period in which they experienced their greatest desegregation-related problems.

- Both bills also expand the flexibility of the compliance eligibility criteria. In the House bill, the DHEW Assistant Secretary may grant a waiver of the compliance criteria related to the discrimination in staff assignments, if the project activities address this problem. The Senate bill does not authorize such a waiver. However, since the Senate bill authorizes planning grants, a district is not required to have ceased discriminatory practices relating to student reassignment and participation if the planning grant project will address those problems.

The new flexibility in these provisions may, if coupled with focused pre-application technical assistance, encourage many of the districts that have desegregated, but have not applied for ESAA, to apply for grants to address their within-school compliance problems.

- Both bills authorize multiyear funding for projects with a limit of 5 years. This change more than any other was desired by school district respondents.

- Both Senate and House bills mandate that criteria related to plan implementation and impact be employed to select grant recipients and eliminate the currently suggested criteria relating to the extent of minority isolation, the general financial need of the district and the deficiencies in the quality of public education in the school district. Also proposed is a new criterion for the "recentness of plan implementation." The bills explicitly define the need for assistance as the expense or difficulty of effectively carrying out a district's plan and the proposed project.

Both bills only moderately redirect the appropriation formulas for grant categories to emphasize assistance for desegregation-related needs.

- Both the House and Senate bills retain the current state apportionment formula based on the number of minority children in each state for Basic grants. The Senate bill, however, removes the NPO grant program from the state apportionment category.

The retention of within-state competition for Basic grants continues to de-emphasize the importance of plan impact measures because plan impact tends to be similar within states.

- In both bills, however, the DHEW Assistant Secretary for Education is authorized to either reapportion excess state funds to other states or to the Special grant programs in which the competitions are nationwide.

Improved Compliance Monitoring

The impact of these proposed changes will be substantial. The new flexibility in the eligibility requirements will require increased compliance monitoring capabilities by the Office for Civil Rights (OCR). This is currently hindered by the lack of an adequate system to provide this information for the large number of potential applicants. This is evidenced by the 2-year period required to process the FY 76 OCR survey data.

Application Rating

Since the Regulations and program guidelines significantly define the operational measures used to select and fund grant recipients, substantial changes will be required in their provisions as a result of the proposed changes in the Act.

The selection criteria mandated in the bills are not particularly relevant to the new districts given threshold eligibility to develop required or nonrequired plans. Statistical score measures relating to reduction in minority isolation assume that the plan has been implemented or at least developed to a point where its impact is known. Grant selection may therefore fall back on the more subjective application ratings performed by non-Federal review panels.

The net effect of the other proposed changes is also to increase the importance of the evaluation of application narratives via quality scores. If the revised statistical score contains only the current measures of reduction in minority isolation and a measure for recentness, a large proportion of current grant recipients would receive few statistical score points. The competition for Basic grants, especially in the north and west, would then be based substantially on quality scores alone.

Quality Rating Process

As shown in Volume I, the validity of the quality score ratings is currently a significant problem. The proposed changes in the Act will increase the significance of these problems.

- We recommend that substantial changes be made in the quality rating process and the Regulations governing the rating criteria to increase the validity of the scores as measures of programmatic need and merit. Specifically:

  - modify the Regulations to increase the weighting of the Needs Assessment section;

  - require a minimum Needs Assessment score for funding;

  - modify panel rating forms to improve their objectivity and reliability;

  - improve the discriminatory power of each item so there will be a range of scores from which one can distinguish "high scores" from "low scores;" and

  - modify panel training procedures to decrease susceptibility of ratings to systematic bias. For example, greater use should be made of standard examples of an appropriate application rating.

Statistical Score

Currently, an eligible applicant may qualify for and receive a grant with no plan impact. The only measures of plan impact recognized in the statistical score are measures of the reduction in minority isolation achieved through implementation of the district's plan. These measures do not necessarily reflect the number of students who have been reassigned under the plan. Reassignments that achieve racial balance may not result in reduction in minority isolation. In some cases, these reassignments are mandated by court or agency order. While Congress has been resistant to providing assistance to achieve racial balance, it may be feasible to use, as a measure of the expense and difficulty of implementing a plan, the number of students reassigned by the eligible plan even if the primary purpose was racial balance.

- We therefore also recommend that the new Regulations include in the statistical score a measure related to the number of students reassigned under a district's eligible required or nonrequired plan as a measure of the expense and difficulty of implementing a plan.

- In order to ensure that an eligible applicant can not receive a grant without some threshold plan impact, we recommend that applications be required to achieve a minimum stat score for plan impact.

Funding Selectivity

All of the changes in the Act, Regulations and program administration related to the selection of grant recipients will have little effect on the focusing of grants to districts with the greatest desegregation-related needs, if the selection process continues to fund all but a small percentage of applicants.

- We therefore recommend that the grant awards process be made more selective. This can be directly accomplished in two ways:

  - Raise the minimum qualifying scores for applications.

- Decrease the national appropriation for ESAA.

The former approach is judged to be generally more preferable for the state apportionment program. Raising the minimum scores ensures that all funded applications in the nation have the same minimum level of plan impact, need and project narrative quality. Since the state apportionment formula is being retained by both bills, the latter approach does not ensure this result. In states in which funds exceed grant requests, selectivity may not be increased at all; funded applications with low scores may still be funded. In states in which requests have exceeded funds, selectivity may increase markedly and applications with relatively high scores nationwide may not be funded.

Determining State Apportionments

Both bills continue to authorize the DHEW Assistant Secretary for Education to determine the appropriate data for state apportionments. Currently, 1970 Census data are employed to determine the number of racial minority children in each state and the 1972 OCR survey data are used to estimate the number of hispanic origin minorities. These data do not reflect the current distribution of minority children among states. They also double count black children of hispanic origin. In addition, the OCR survey was a national sample of school districts that may not be valid for individual states.

- Since the 1975 Survey of Income and Education (SIE) performed by the Bureau of Census provides more recent and consistent data on the number of racial and language minorities in each state, we recommend that these data be employed to calculate state apportionments in order to more accurately reflect the current distribution of minority children.

The impact of using SIE data instead of the Census data is shown in Table 2. The state apportionments for FY 77 using both data sources are compared. The use of the SIE data still does not eliminate many of the problems resulting from employing a formula based on minority children. However, problems of data accuracy and currentness are minimized.

TABLE 2 COMPARISON OF STATE APPORTIONMENTS USING 1970 CENSUS DATA AND 1975 SIE DATA

70 PERCENT - PERCENT OF NATION'S MINORITY CHILDREN IN STATE, 1970 CENSUS DATA
75 PERCENT - PERCENT OF NATION'S MINORITY CHILDREN IN STATE, 1975 SIE DATA
70 APPORTNMT - TOTAL STATE APPORTIONMENT FOR 1977 USING 1970 DATA
75 APPORTNMT - TOTAL STATE APPORTIONMENT FOR 1977 USING 1975 DATA
PCT CHANGE - CHANGE IN APPORTIONMENT FROM USING 1970 DATA TO USING 1975 DATA

(DOLLARS IN THOUSANDS)

STATE	70 PERCENT	75 PERCENT	70 APPORTNMT	75 APPORTNMT	PCT CHANGE	COL4 - COL3
ALABAMA	2.9	2.4	5467.4	4473.5	-18.2	-993.9
ALASKA	0.2	0.2	493.2	482.0	-2.3	-11.3
ARIZONA	1.5	1.6	2747.7	2947.6	7.3	199.9
ARKANSAS	1.2	1.0	2227.2	1903.7	-14.5	-323.5
CALIFORNIA	13.2	14.7	24318.8	27088.6	11.4	2769.8
COLORADO	1.0	1.1	1928.2	2061.4	6.9	133.3
CONNECTICUT	0.8	0.8	1547.7	1619.3	4.6	71.6
DELAWARE	0.3	0.2	555.9	479.4	-13.8	-76.5
DIST. OF COLUMBIA	1.4	1.1	2705.9	2141.1	-20.9	-564.8
FLORIDA	4.2	5.2	7697.2	9567.1	24.3	1869.9
GEORGIA	3.8	3.5	6968.6	6505.6	-6.6	-462.9
HAWAII	1.3	1.4	2367.6	2589.6	9.4	221.9
IDAHO	0.1	0.1	246.0	301.8	22.7	55.8
ILLINOIS	5.5	5.9	10074.3	10851.1	7.7	776.8
INDIANA	1.3	1.2	2484.4	2364.2	-4.8	-120.3
IOWA	0.2	0.2	352.6	377.5	7.0	24.8
KANSAS	0.5	0.5	923.2	1052.1	14.0	128.9
KENTUCKY	0.7	0.7	1336.2	1424.6	6.6	88.4
LOUISIANA	3.6	3.2	6670.2	5967.2	-10.5	-703.0
MAINE	0.0	0.2	111.0	424.6	282.4	313.5
MARYLAND	2.2	2.4	4195.0	4524.2	7.8	329.2
MASSACHUSETTS	0.8	0.9	1459.9	1722.7	18.0	262.8
MICHIGAN	3.3	2.8	6206.1	5155.6	-16.9	-1050.6
MINNESOTA	0.3	0.3	541.7	665.7	22.9	123.9
MISSISSIPPI	2.8	2.3	5245.1	4357.5	-16.9	-887.6
MISSOURI	1.5	1.4	2890.5	2578.2	-10.8	-312.3
MONTANA	0.1	0.1	309.7	231.4	-25.3	-78.3
NEBRASKA	0.2	0.3	440.2	583.3	32.5	143.0
NEVADA	0.2	0.3	362.8	543.4	41.9	160.5
NEW HAMPSHIRE	0.0	0.0	100.0	111.5	11.5	11.5
NEW JERSEY	3.1	3.2	5806.1	5892.9	1.5	86.8
NEW MEXICO	1.4	1.6	2705.5	2981.0	10.2	275.4

TABLE 2 COMPARISON OF STATE APPORTIONMENTS USING 1970 CENSUS DATA AND 1975 SIE DATA

70 PERCENT - PERCENT OF NATION'S MINORITY CHILDREN IN STATE, 1970 CENSUS DATA[a]
75 PERCENT - PERCENT OF NATION'S MINORITY CHILDREN IN STATE, 1975 SIE DATA[b]
70 APPORTNMT - TOTAL STATE APPORTIONMENT FOR 1977 USING 1970 DATA
75 APPORTNMT - TOTAL STATE APPORTIONMENT FOR 1977 USING 1975 DATA
PCT CHANGE - CHANGE IN APPORTIONMENT FROM USING 1970 DATA TO USING 1975 DATA

(DOLLARS IN THOUSANDS)

STATE	70 PERCENT	75 PERCENT	70 APPORTNMT	75 APPORTNMT	PCT CHANGE	COL4 - COL3
NEW YORK	9.7	10.0	17925.7	18445.2	2.9	519.6
NORTH CAROLINA	3.7	3.3	6922.7	6183.5	-10.7	-739.3
NORTH DAKOTA	0.1	0.0	203.6	157.5	-22.6	-46.0
OHIO	3.2	2.7	5870.0	5090.2	-13.3	-779.8
OKLAHOMA	0.9	0.7	1767.5	1382.0	-21.8	-385.6
OREGON	0.2	0.3	494.9	630.5	27.4	135.6
PENNSYLVANIA	3.2	3.0	5852.6	5578.7	-4.7	-273.9
RHODE ISLAND	0.1	0.1	250.4	296.2	18.3	45.8
SOUTH CAROLINA	2.7	2.5	4974.5	4651.5	-6.5	-323.1
SOUTH DAKOTA	0.1	0.1	316.2	218.5	-30.9	-97.8
TENNESSEE	1.9	1.7	3639.3	3245.1	-10.8	-394.2
TEXAS	10.2	10.9	18707.4	20052.9	7.2	1345.6
UTAH	0.2	0.2	443.2	366.1	-17.4	-77.1
VERMONT	0.0	0.0	100.0	100.0	0.0	0.0
VIRGINIA	2.7	2.2	5011.2	4144.3	-17.3	-866.8
WASHINGTON	0.6	0.5	1204.0	1025.7	-14.8	-178.3
WEST VIRGINIA	0.2	0.1	451.0	279.8	-37.9	-171.1
WISCONSIN	0.6	0.5	1214.3	1024.8	-15.6	-189.5
WYOMING	0.1	0.1	195.4	207.9	6.4	12.5
FEDERAL TOTAL	100.0	100.0	187049.9	187049.9	4.4	0.0

a. Source: 1970 Census data for racial minority children and 1972 OCR survey data for hispanic origin children. Tabulations by DHEW/NCES for EEOP.

b. Source: 1975 SIE survey data tabulated by DHEW/NCES. Both above tabulations double count children that are members of both racial and language minorities (e.g., black-hispanic children). Unlike the Census-OCR data, however, the SIE data permit elimination of this double counting.

APPENDIX. SUMMARY OF FINDINGS VOLUMES I AND II

SUMMARY OF FINDINGS

Volume I: The Targeting of ESAA Grants and Grant Funds

The objectives of this part of the study, Assessment of ESAA Program Operations, were:

- to determine the extent to which ESAA grants and grant funds have been targeted, or focused, on school districts with the greatest desegregation-related needs that propose projects with the highest educational and programmatic merit; and

- to determine the influence of ESAA program operations on the targeting of grants and grant funds.

The Act and Regulations specify criteria that in effect identify the desegregation-related characteristics of intended ESAA grant recipients. These criteria are of two types: minimum eligibility criteria and selection criteria. According to these criteria, the intended grant recipients for Basic, Pilot, Bilingual and most Special grants are:

- only those school districts implementing a required or non-required plan to desegregate, or reduce or eliminate minority isolation;

- only those school districts not engaging in discriminatory practices or policies with respect to race, color, or national origin;

- those school districts with high impact plans; i.e., plans that have reduced, or are likely to reduce or prevent, minority isolation to a high degree, that are comprehensive and district-wide, and that fully involve community resources;

- those LEAs with high relative need for assistance as demonstrated primarily by high number and percent minority pupils; and

- those eligible applicants with high quality projects, that is, proposed projects that have a high likelihood of achieving the purposes of the Act as measured by the quality score rating of the proposed project.

We found that ESAA program operations have effectively focused grants to applicants that fulfill civil rights compliance criteria and to districts that have had a high relative need for assistance as measured by the number and percent minority students. Grant funds in FY 77 were primarily focused to recipients with high minority enrollment and high number of minority students whose isolation had been reduced.

However, we also found that ESAA grants and grant funds have not been effectively focused to districts with applications of high educational and programmatic merit, with comprehensive plans, or with a high relative need because of the recency of plan implementation.

The ESAA Special grant program has been used to alleviate some of the consequences of the inadequacies in the targeting of Basic grant funds. Special grants have been used to focus ESAA funds to recently desegregating districts and to urban districts whose grant fund requests would exceed the available state apportionments. However, Special grants to unfunded FY 77 Basic grant applicants implementing non-required plans have decreased the selectivity of the Basic grant competitive process.

Target: LEAs with Eligible Required or Non-Required Plans

ESAA grants have been received by less than one-half of the districts known to have had high reductions in minority isolation and to have been subject to a court or agency order. A large number of these potentially eligible districts have not applied for ESAA grants. Their decisions not to apply have been attributed to dislike for OCR compliance eligibility reviews. The ESAA program has also been perceived to be geared to districts with high numbers of minority pupils.

Target: LEAs Without Discriminatory Practices With Respect to Students or Staff

Most applicants initially found to be in non-compliance with civil rights eligibility criteria have taken the necessary steps to comply and achieve ESAA eligibility. The review of compliance eligibility after application submittal has encouraged applicants selected for funding to correct compliance problems.

Target: LEAs Implementing a Plan With High Impact

ESAA grants have not been effectively focused to districts with high plan impact as measured by reduction in minority isolation. Sixty percent of the districts which had a relatively high reduction in minority isolation prior to 1974 never received an ESAA grant. Many of these districts have not applied for ESAA grants. However, 40 percent of the districts in the north and west (14 percent nation-wide) that received a Basic grant in FY 77 did not reduce the number or percent of minority pupils in minority isolation to any degree. Contributing program factors have been:

- The state apportionment formula as specified by the Act is unrelated to the number of districts in the state that are implementing eligible plans and unrelated to the impact of the plans.
- The within-state competition specified by the Act and Regulations for the state funds has hindered the nation-wide selection of districts with high impact plans.
- The minimum score criterion for total application scores has not effectively eliminated applications with minimal plan impact or need.
- Although the selection process has been competitive, almost all Basic and Pilot applications above the minimum score criteria have received grants.
- Threshold eligibility criteria do not fulfill any role in restricting applicants on the basis of plan impact.

ESAA grants may not have been focused to districts with high plan impact as measured by the extent of student reassignment. The Act and Regulations recognize as an eligible plan, any plan implemented pursuant to a court or agency order, but do not recognize such a plan as having any impact if it requires student reassignment among schools in which (1) there was no minority isolation or (2) the reassignment only involves two or more minority groups, rather than minority and white groups.

Independent of enrollment size, more FY 77 Basic grant funds were awarded, on the average, to recipients with high effective reduction in the number of minority children who are isolated. Like grants, however, 40 percent of the funds in the north and west were awarded to grant recipients with no net reduction in minority isolation. Major factors are the state apportionment formula and the within-state competition as described above.

Target: LEAs with High Relative Need

ESAA grants have been highly focused to districts with high relative need as measured by the combined stat score for the number and percent minority students in the districts. The most distinguishing characteristic of grant recipients and non-recipients was the combined score for number and percent minority pupils. Contributing program factors have been:

- The stat score as specified by the Regulations includes as the only measure of relative need the combined score for number and percent minority pupils.
- The stat score has been the primary determinant of ranking applications for funding since the quality scores have been narrowly distributed in most states.
- The within-state competition has de-emphasized the influence of the measures of plan impact. Most applicants in the north and west have received few points for plan impact and therefore the measures of number and percent minority dominate.
- The minimum score criterion for total application scores has eliminated few applicants from the selection process.

- The state appropriation formula specified by the Act favors states with a high number of minority children.

- Pilot grant eligibility is specifically based on high number and percent of minority pupils.

Similarly, ESAA grant funds have been more highly focused to recipients with high minority (or equivalently, total) enrollment than to any other districts.

ESAA grants and grant funds, however, have not been focused to districts with high relative needs as measured by other criteria, such as recency. Two-thirds of the FY 77 Basic grants were awarded to LEAs that implemented an eligible plan prior to 1973. Contributing program factors have been:

- The validity of the stat score has been hindered as a measure of the relative need that arises from the implementation of a plan since recently desegregating applicants have competed on an equal basis with applicants who implemented a plan over 5 years ago.

- The relatively few points allowed the Needs Assessment section in the quality score has hindered the importance of measures of need that cannot be incorporated into the stat score because the data are less uniformly available or the criteria are less objective. Among these criteria might be the continued need for assistance and the measures suggested in the Act: general financial need; deficiencies in the quality of public education; and the expense and difficulty of implementing the district's plan.

- The influence of the Needs Assessment section on the total score has been hindered further by all the program factors affecting the validity of the total quality score: narrow distribution and susceptibility to systematic bias, as described further below.

Target: LEAs With Applications of High Educational and Programmatic Merit

ESAA grants and grant funds have not been explicitly focused to LEAs with applications with high educational and programmatic merit. Contributing program factors have been:

- The quality score as a valid measure of programmatic merit has been hindered by the relatively low maximum point score allowed the Needs Assessment section of the application by the Regulations.

- The quality score as a valid measure of merit has been hindered by its susceptibility to systematic biases as a result of an inadequate rating form and differences in panel selection and training. These areas are governed by program administration guidelines.

- The narrow distribution of quality scores has not allowed the identification of applications with above average merit as measured by the quality scores. As a result, the quality score has not contributed to the selection of grants in many states; a competition based on stat score alone would have produced nearly the same results. This result is consistent with the view of the role of the quality score by EEOP officers. However, it is inconsistent with the administrative cost and time devoted to rating applications.

- The minimum quality score criterion has eliminated few applications (5 percent) from the grant competition since the quality scores have been narrowly distributed around the maximum point score.

While ESAA grant funds were negatively correlated with application quality scores, the reductions in proposed project budgets were positively related to application quality scores: recipients with lower quality scores had greater percentage reductions in their proposed project budget. ESAA grant funds have been substantially affected by the administrative review of project budgets. This process follows the quality score review.

SUMMARY OF FINDINGS

Volume II: The Focus of ESAA Projects

The objectives of this second part of the study, Assessment of ESAA Program Operations, were:

- to determine the extent to which ESAA projects have been focused on the desegregation-related needs of funded school districts; and
- to determine the influence of ESAA program operations on the foci of ESAA projects.

Desegregation-related needs are broadly interpreted to include (1) needs related to the physical reassignment of students and staff, or other actions to eliminate discriminatory practices and to reduce or prevent minority isolation; and (2) needs related to actions beyond reassignment that seek to establish equal status interactions within schools.

The Act and Regulations authorize support for projects having varying relationships with school districts' required or non-required plans to reduce or prevent minority isolation. Only projects funded in the Basic and Non-Profit Organization grant categories are explicitly mandated by the Regulations to be directly related and necessary to the implementation of district plans. Although a district must be implementing an eligible plan to receive a Pilot or Bilingual grant, funded activities are not mandated to be related to the plan, nor to be in schools affected by the plan. For some ESAA Special grants, districts need not be implementing an eligible plan.

As a result of these eligibility requirements specified in the Act, ESAA projects do not focus on district planning and implementation needs related to the physical reassignment of students and faculty, nor to the development of procedures prior to plan implementation for preventing discriminatory practices with respect to minority personnel, to student assignments within schools, and to student discipline practices. Respondents in case study districts with court-ordered plans felt that their

greatest problems were in the period just prior to implementation. Since Title IV (Civil Rights Act) directly addresses these needs and since the number of newly desegregating districts is small, this may not be a major area requiring further Federal assistance.

Most ESAA grant recipients are in the phase of desegregation requiring educational system changes to establish and promote equal status interactions and expectations. Activities authorized to meet the needs of districts include remedial services, guidance and counseling, inservice training, community activities, career education, and innovative multicultural or extracurricular activities. From the case studies of ESAA projects in 22 school districts across the country we found that:

- Most Basic grant projects focused on direct services to students and teachers, rather than intergroup activities. The most common focus was remedial services. ESAA remedial services were being used by school districts to complement Title I services by providing similar services to schools or grades not served by Title I. ESAA was the flexible answer to their many remediation needs. In a large proportion of districts, ESAA funds were comparable to Title I funds.

- While not as prevalent as remedial services, inservice training for teachers, and guidance and counseling services for children were also foci of Basic grant projects. These activities tended to be more related to the implementation of a district's plan. Other types of authorized activities such as community activities and interracial/extracurricula activities were almost absent.

- Although Pilot projects were authorized to focus on innovative approaches to improving the academic achievement of minority isolated students, in many sites they were less directly related to achievement and more related to human relations and multicultural activities than Basic projects. No evidence was found that Pilot

projects had been replicated to other schools or districts, although potential replicability is one of the criteria used to rate Pilot project applications.

- Most NPO projects emphasized community involvement in the schools through tutoring, cultural enrichment or recreational activities and, as such, supplemented school district activities. Only one project appeared to be particularly focused on needs arising from the implementation of a district's plan: it helped minority parents monitor the assignment of pupils to special education classes.

- Emergency Special projects as implemented primarily served to augment services provided under Basic and Pilot grants to more recently desegregating school districts.

- As authorized and implemented, Bilingual grant projects overlapped in goals and focus the projects funded under the Bilingual Education Act (Title VII, ESEA).

Aside from specifying the type of activities that may be supported, ESAA program operations particularly influence the focus of Basic projects in the application and budget review processes by the deletion of components judged to be unrelated to the plan, or by the deletion of schools judged unaffected by the plan. These judgments are susceptible, however, to a high degree of variation as a result of conflicting program guidelines. Other regulatory provisions relating to recency of plans, court-ordered ESAA-like activities, and private school eligibility prevent a consistent view of what activities are related to district plans and what schools are affected by plans. In particular, provisions in the Act and Regulations permit and encourage private schools to be served by ESAA projects that would not be eligible if they were public schools.

School district respondents reported that ESAA projects were meeting many of their most important needs. If more grant funds were available, they

would expand their current project activities. If there were no ESAA funds, the districts would not be able to support the activities.

Whether the needs were related to desegregation and the establishment of equal status interactions within schools, however, depended on district perceptions of the purposes of ESAA. In several districts which had completed implementation of their desegregation plans prior to 1968, ESAA was perceived as addressing the "educational disadvantages of minority children" and thus ESAA projects were solely focused on compensatory education. At the opposite end, several districts perceived ESAA to be highly related to integration and consequently their projects had no compensatory education components; that was left for Title I projects. In most other districts, ESAA was perceived as related to desegregation, but this led to projects directed primarily at ESAA's third purpose -- to aid school children overcome the disadvantages of minority isolation.

The most commonly cited desegregation-related need, regardless of region, plan type and implementation year, was inservice teacher training. Many respondents felt that desegregation was being hindered by the indifferent and negative attitudes of teachers, or their inability to adapt their teaching styles to the special needs of classrooms with students from diverse backgrounds. Despite this universally felt need, only half the projects studied included an inservice training component.

Prior research studies have shown that teacher behavior is governed to a large extent by school policy which in turn is influenced by school principal leadership. Since neither the Act nor the Regulations identify or authorize appropriate training or technical assistance for principals or other administrators, the ESAA program has not recognized one of the important keystones to achieving successful desegregation.

In sum, those recipients who view ESAA as addressing needs associated with integration and the establishment of equal status interactions and expectations have ESAA projects focused on these needs. Those recipients who do not view ESAA as desegregation-related, focus projects on remedial services. The Act, Regulations and program guidelines do not adequately present with consistency and clarity the purposes of ESAA to encourage the former view as opposed to the latter.